

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**KAREN LURIE,**

**Plaintiff,**

**v.**

**GLOBE LIFE AND ACCIDENT  
INSURANCE COMPANY, et al.,**

**Defendant,**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**Case No. 1:06-cv-0034MEF**

---

**PLAINTIFFS' DEPOSITION DESIGNATIONS**

---

Plaintiff and Plaintiff's counsel state unto the Court that they do not expect to read any excerpts of any depositions at the trial of this cause, except possibly for impeachment purposes. Based upon conversations with counsel for Defendant Globe Life, all Globe Life employees that have been deposed are expected to appear at trial to provide testimony. Plaintiff's counsel has been informed that there is, however, an outside possibility that Ms. Barbara Hernandez of Globe Life may be unable to travel from Globe Life's headquarters in Oklahoma to Alabama due to a current health condition. If the outside possibility of Ms. Hernandez being unable to appear at trial to provide testimony is realized, Plaintiff reserves the right to read her deposition into evidence at that time in its entirety. Attached hereto as exhibit "A" is a complete copy of the Barabara Hernandez deposition.

/s/Christopher E. Sanspree  
CHRISTOPHER E. SANSPREE  
Attorney for the Plaintiff

**OF COUNSEL:**

**BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.**

Post Office Box 4160  
Montgomery, Alabama 36103-4160  
(334) 269-2343 Telephone/(334) 954-7555 Facsimile

Mr. William B Matthews, Jr.  
**Matthews & Filmore, L.L.C.**

Post Office Box 1145  
Ozark, Alabama 36361  
(334) 774-8804 telephone

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all counsel of record as listed below by placing a copy of the same in the United States Mail, first class, postage prepaid on this the **18<sup>th</sup>** day of **January** 2007.

**s/Christopher E. Sanspree**  
OF COUNSEL

Robert E. Poundstone IV  
**Bradley Arant Rose & White, LLP**  
The Alabama Center for Commerce  
401 Adams Avenue, Suite 780  
Montgomery, Alabama 36104  
(334) 956-7700  
(334) 956-7701 fax